NATALIE K. WIGHT, OSB #035576 United States Attorney District of Oregon JUDITH R. HARPER, OSB #903260 Assistant United States Attorney Judi.Harper@usdoj.gov 310 West Sixth Street Medford, OR 97501 Telephone: (541) 776-3564 Attorneys for United States of America

# UNITED STATES DISTRICT COURT DISTRICT OF OREGON

#### **EUGENE DIVISION**

UNITED STATES OF AMERICA,

6:23-cv-01774-MO

Plaintiff,

v.

COMPLAINT, in rem, FOR FORFEITURE

1190 27TH AVENUE, SWEET HOME, LINN COUNTY, DISTRICT OF OREGON, WITH BUILDINGS, APPURTENANCES AND IMPROVEMENTS, in rem,

Defendant.

Plaintiff, United States of America, for its complaint in rem for forfeiture, alleges:

I.

This Court has subject matter jurisdiction, in rem jurisdiction, and venue pursuant to

21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

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II.

Defendant, *in rem*, 1190 27th Avenue, Sweet Home, Linn County, District of Oregon, more particularly described as:

### PARCEL I:

PARCEL 2, ACCORDING TO PARTITION PLAT NO. 1998-10, IN THE CITY OF SWEET HOME, FILED MARCH 9, 1998, RECORDS OF THE COUNTY OF LINN AND STATE OF OREGON.

### PARCEL II:

PARCEL 1, ACCORDING TO PARTITION PLAT NO. 1998-10, IN THE CITY OF SWEET HOME, FILED MARCH 9, 1998, RECORDS OF THE COUNTY OF LINN AND STATE OF OREGON

is now and during the pendency of this action will be within the jurisdiction of this Court.

III.

Defendant, *in rem*, 1190 27th Avenue, Sweet Home, Linn County, District of Oregon, represents proceeds traceable to an exchange for controlled substances or was used or intended to be used to facilitate such a transaction in violation of 21 U.S.C. §§ 841, 846, and 856 and is forfeitable to the United States pursuant to the provisions of 21 U.S.C. § 881(a)(7), as more particularly set forth in the declaration of Peter Ardissono, Special Agent, Drug Enforcement Administration, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, plaintiff, United States of America, prays that due process issue to enforce the forfeiture of defendant, *in rem*, 1190 27th Avenue, Sweet Home, Linn County,

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District of Oregon; that due notice be given to all interested persons to appear and show cause why forfeiture of this defendant, *in rem*, should not be decreed; that due proceedings be had thereon; that these defendants be forfeited to the United States; that the plaintiff United States of America be awarded its costs and disbursements incurred in this action.

DATED: November 29, 2023. Respectfully submitted,

NATALIE K. WIGHT United States Attorney

s/ Judith R. Harper

JUDITH R. HARPER

Assistant United States Attorney

## **VERIFICATION**

I, Peter Ardissono, declare under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with the Drug Enforcement Administration and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

s/ Peter Ardissono

PETER ARDISSONO
Special Agent
Drug Enforcement Administration